Air Quality Permitting
Response to Public Comments

April 9, 2018

Permit to Construct No. P-2018.0012

Project No. 62000

Lake Pre-Mix, Inc.
Ponderay, Idaho

Facility ID No. 017-00072

Prepared by:
Tom Burnham, Permit Writer
AIR QUALITY DIVISION

Final

Table of Contents

BACKGROUND

The Idaho Department of Environmental Quality (DEQ) provided for public comment on the proposed permit to construct for Lake Pre-Mix, Inc. from March 1 through March 30, 2018, in accordance with IDAPA 58.01.01.209.01.c. During this period, comments were submitted in response to DEQ's proposed action. Each comment and DEQ's response is provided in the following section. All comments submitted in response to DEQ's proposed action are included in the appendix of this document.

PUBLIC COMMENTS AND RESPONSES

Public comments regarding the technical and regulatory analyses and the air quality aspects of the proposed permit are summarized below. Questions, comments, and/or suggestions received during the comment period that did not relate to the air quality aspects of the permit application, the Department's technical analysis, or the proposed permit are not addressed. For reference purposes, a copy of the Rules for the Control of Air Pollution in Idaho can be found at: http://adminrules.idaho.gov/rules/current/58/0101.pdf.

Comment 1: We request DEQ explain why sections 2.1 and 2.2 of Lake Pre-Mix's draft permit, for its proposed new location in Ponderay, do not include all of the provisions and requirements listed in sections 2.1 and 2.2 of Lake Pre-Mix's expired permit, for its old location in Sandpoint. Lake Pre-Mix's expired permit appears to include several requirements and precautions not included in the proposed permit, including provisions requiring a Fugitive Dust Control Plan.

Given the proximity of the proposed facility site to local residences, McNearney Park (the City of Ponderay's only public park), and the regional animal shelter, we want to ensure that any new air quality permit for Lake Pre-Mix is no less stringent than its expired permit. The proposed facility site would also be less than half a mile from the City's proposed Field of Dreams, a public park over 24 years in the making.

We request DEQ revise the draft permit to ensure that it is no less stringent than Lake Pre-Mix's expired permit, including but not limited to adding a Fugitive Dust Control Plan. Further, if DEQ declines to include more stringent provisions from the expired permit into the draft permit, we request DEQ explain why these differences are justified.

Response 1: For concrete batch plant general permits, DEQ developed the template language for fugitive dust control in Permit Conditions 2.1 and 2.2 to include all of the requirements and provisions of IDAPA 58.01.01.650-651, and to be applied equitably to like facilities across the state. The commenter is correct regarding the older permit "Fugitive Dust Control Plan" not being specifically stated. However, many of the requirements are still in the permit using more specific language, such as (taken straight out of the permit):

- Application, where practical, of water, or suitable chemicals to, or the covering of, dirt roads, material stockpiles, and other surfaces which can create dust.
- Good operating practices, including water spraying or other suitable measures, shall be employed to prevent dust generation and atmospheric entrainment during operations such as stockpiling, screen changing and general maintenance.
- The permittee shall monitor and maintain records of the frequency and the method(s) used (e.g., water, chemical dust suppressants) to reasonably control fugitive dust emissions.
- Installation and use, where practical, of hoods, fans, and fabric filters systems to enclose the handling of dusty materials.

Whereas the "Fugitive Dust Control Plan" language only required weekly monitoring for visible emissions, DEQ's current template language requires the permittee to "conduct a daily facility-wide inspection of potential sources of fugitive dust emissions, during daylight hours

and under normal operating conditions". This not only requires more frequent inspections, but also specifies the time of day to ensure that the methods used to reasonably control fugitive dust emissions are effective. Considering this, DEQ asserts that the proposed permit language is as stringent as the previous permit and that including the requirement for a "Fugitive Dust Control Plan" would be redundant.

Furthermore, during the 20 plus years of operations, this facility at its previous location has not had any complaints reported to DEQ and the facility has invested in modernized equipment since the last permit was issued.

Appendix

Public Comments Submitted for

Permit to Construct

No. P-2018.0012

IDAHO
CONSERVATION
LEAGUE

Tanya Chin
Air Quality Division
DEQ State Office
1410 N. Hilton
Boise, ID 83706

Submitted via email to: tanya.chin@deq.idaho.gov and tom.burnham@deq.idaho.gov

March 30, 2018

RE: Draft PTC for Lake Pre-Mix, Sandpoint

Dear Ms. Chin:

Since 1973, the Idaho Conservation League has been Idaho's leading voice for clean water, clean air and wilderness—values that are the foundation for Idaho's extraordinary quality of life. The Idaho Conservation League works to protect these values through public education, outreach, advocacy and policy development. As Idaho's largest state-based conservation organization, we represent over 25,000 supporters, many of whom have a deep personal interest in protecting Idaho's human health and environment.

Attached, please find my comments on behalf of the Idaho Conservation League regarding DEQ's proposed air quality permit to construct for Lake Pre-Mix, Sandpoint. Four associated attachments were included via email.

Please do not hesitate to contact me at (208) 265-9565 or mnykiel@idahoconservation.org if you have any questions regarding our comments or if we can provide you with any additional information on this matter.

Thank you for your time and consideration.

Sincerely,

Matthew Nykiel
Conservation Associate

ICL Comments

We request DEQ explain why sections 2.1 and 2.2 of Lake Pre-Mix's draft permit, for its proposed new location in Ponderay, do not include all of the provisions and requirements listed in sections 2.1 and 2.2 of Lake Pre-Mix's expired permit, for its old location in Sandpoint.

Lake Pre-Mix's expired permit[1] appears to include several requirements and precautions not included in the proposed permit,[2] including provisions requiring a Fugitive Dust Control Plan. Given the proximity of the proposed facility site to local residences, McNearney Park (the City of Ponderay's only public park), and the regional animal shelter, we want to ensure that any new air quality permit for Lake Pre-Mix is no less stringent than its expired permit.[3] The proposed facility site would also be less than half a mile from the City's proposed Field of Dreams, a public park over 24 years in the making.[4]

We request DEQ revise the draft permit to ensure that it is no less stringent than Lake Pre-Mix's expired permit, including but not limited to adding a Fugitive Dust Control Plan. Further, if DEQ declines to include more stringent provisions from the expired permit into the draft permit, we request DEQ explain why these differences are justified.

[1] Expired permit included in Attachment A.
[2] Proposed draft permit included in Attachment B.
[3] See Attachment C.
[4] See Attachment D.

Attachment A

STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

1410 North Hilton • Boise, Idaho 83706 • (208) 373-0502

C.L. "Butch" Otter, Governor
Toni Hardesty, Director

August 6, 2009

Certified Mail No. 7190 0596 0011 0000 1242

Steve Lafrenz, President
Lake Pre-Mix Concrete, Inc.
P. O. Box 1356
Sandpoint, ID 83864

RE: Facility ID No. 777-00182, Lake Pre-Mix Concrete, Inc.
Portable Final Tier II Operating Permit

Dear Mr. Lafrenz:

The Department of Environmental Quality (DEQ) is issuing Tier II Operating Permit No. T2-040114 to Lake Pre-Mix Concrete, Inc. for a portable truck mix concrete batch plant (operation within the Sandpoint downtown area being prohibited) in accordance with IDAPA 58.01.01.400 through 406, Rules for the Control of Air Pollution in Idaho (Rules).

The enclosed Tier II operating permit is based on the information contained in your permit application. This Tier II permit is effective immediately and replaces your previous permit issued on May 17, 1996, the terms and conditions of which no longer apply. This permit does not release Lake Pre-Mix Concrete, Inc. from compliance with all other applicable federal, state, or local laws, regulations, permits, or ordinances. Please note that this permit expires five years after the issuance date.

In accordance with IDAPA 58.01.01.407, DEQ has assessed the emissions for this permit and determined that a Tier II processing fee of $2,500 will be due. A fee invoice will be sent to you from the DEQ fiscal office shortly. Failure to submit a Tier II operating permit processing fee within 45 days of receipt of the fee invoice will result in a monthly accrual of interest in the amount of 12% per annum on the outstanding balance until the fee is paid in full.

In order to fully understand the compliance requirements of this permit, DEQ highly recommends that you schedule a meeting with Almer Casile, Air Quality Analyst, at 208-769-4600 to review and discuss the terms and conditions of this permit. Should you choose to schedule this meeting, we recommend that the following representatives attend

✂----------

Please make checks payable to: Department of Environmental Quality. Please write your permit number on the check and remit the fee and this information to the following:

Idaho Department of Environmental Quality
Fiscal Office – Air Quality
1410 N. Hilton, Boise, ID 83706-1255

Amount Enclosed: $ _____.____ Check No.: _____

_____

DEPARTMENT USE ONLY:			
Facility	Lake Pre-Mix Concrete, Inc.	**Facility ID:**	777-00182
Project	Tier II Permit Renewal	**Permit No.:**	T2-040114
Fee Type:	Tier II Processing Fee	**Fee Amount:**	$ 2,500.00
Routing Instructions: Copy Air Program upon receipt of fee.			

✂----------

Air Quality **TIER II OPERATING PERMIT** **State of Idaho** **Department of Environmental Quality**	**PERMIT No.:** T2- 040114 **FACILITY ID No.:** 777-00182 **AQCR:** Portable **CLASS:**B **ZONE:** Portable **SIC:** 3273 **NAICS:** 327320 **UTM COORDINATE (km):** Portable	

1. **PERMITTEE** Lake Pre-Mix Concrete, Inc.			
2. **PROJECT** Johnson 630 portable concrete batch plant Tier II permit renewal			
3. **MAILING ADDRESS** P. O. Box 1356	**CITY** Sandpoint	**STATE** ID	**ZIP** 83864
4. **FACILITY CONTACT** Steve Lafrenz	**TITLE** President	**TELEPHONE** 208-263-5000	
5. **RESPONSIBLE OFFICIAL** Steve Lafrenz	**TITLE** President	**TELEPHONE** 208-263-5000	
6. **EXACT PLANT LOCATION** Portable, except operation within the Sandpoint downtown area is prohibited (1430 N. Boyer Ave., Sandpoint, ID 83864)		**COUNTY** Bonner	
7. **GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS** Truck Mix Concrete Batch Plant			

8. **PERMIT AUTHORITY**

This permit is issued according to the Rules for the Control of Air Pollution in Idaho, IDAPA 58.01.01.400 through 410, and pertains only to emissions of air contaminants regulated by the state of Idaho and to the sources specifically allowed to be operated by this permit.

This permit has been granted on the basis of design information presented with its application. Changes in design, equipment or operations may be considered a modification. Modifications are subject to DEQ review in accordance with IDAPA 58.01.01.200 through 228 of the Rules for the Control of Air Pollution in Idaho.

Mary Capiral

MARY CAPIRAL, PERMIT WRITER
DEPARTMENT OF ENVIRONMENTAL QUALITY

MIKE SIMON, STATIONARY SOURCE PROGRAM MANAGER
DEPARTMENT OF ENVIRONMENTAL QUALITY

Date Issued:	August 6, 2009
Date Modified/Revised:	
Date Expires:	August 6, 2014

Table of Contents

Acronyms, Units, and Chemical Nomenclature

AIRS	Aerometric Information Retrieval System
AQCR	Air Quality Control Region
Btu	British thermal unit
CFR	Code of Federal Regulations
cfm	cubic feet per minute
CO	carbon monoxide
DEQ	Department of Environmental Quality
dscf	dry standard cubic feet
EPA	U.S. Environmental Protection Agency
ft	feet
HAP	hazardous air pollutant
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
km	kilometer
lb/hr	pound(s) per hour
m	meter(s)
MACT	Maximum Achievable Control Technology
$\mu g/m^3$	micrograms per cubic meter
MMBtu	million British thermal units
MMscf	million standard cubic feet
NAICS	North American Industry Classification System
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO_2	nitrogen dioxide
NO_X	nitrogen oxides
NSPS	New Source Performance Standards
PM	particulate matter
PM_{10}	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
PTC	permit to construct
PTE	potential to emit
scf	standard cubic feet
SIC	Standard Industrial Classification
SIP	State Implementation Plan
SM	synthetic minor
SO_2	sulfur dioxide
SO_x	sulfur oxides
T/yr	tons per year
UTM	Universal Transverse Mercator
VOC	volatile organic compound

1. TIER II OPERATING PERMIT SCOPE

Purpose

1.1 The purpose of this Tier II permit is to renew the Tier II operating permit of Lake Pre-Mix Concrete, Inc.

In addition, emissions from the NATCO A53G water boiler in use at the facility will be incorporated in this permit. The water boiler was not included in the facility's previous permit due to the low emissions resulting from its use.

1.2 Those permit conditions that have been modified or revised by this permitting action are identified by a date citation located directly under the permit condition and on the right hand margin.

1.3 This Tier II operating permit renewal replaces the following permit(s), the terms and conditions of which shall no longer apply:

- Tier II Operating Permit No. 777-00182, issued May 17, 1996, expired May 17, 2001.

Regulated Sources

1.4 Table 1.1 lists all sources of regulated emissions in this permit.

Table 1.1 SUMMARY OF REGULATED SOURCES

Permit Section	Source Description	Emissions Control(s)
3	Cement storage silo	Baghouse Manufacturer: Besser Model: DCS 260 Type: shaker Number of Bags: 42
3	Fly ash storage silo	Baghouse Manufacturer: Besser Model: DCS 260 Type: shaker Number of Bags: 42
3	All associated fugitive PM_{10} emissions from the following: sand, aggregate, and cement transfer from batch mix plant into drum of concrete delivery truck, or equivalent	Shrouding fogger unit
3	All associated fugitive PM_{10} emissions from the following: sand and aggregate transfers, weigh hopper loading, vehicle traffic, and wind erosion of stockpiles	Reasonable control
4	Water Boiler Manufacturer: NATCO Model: A53G Heat input rating: 2.5 MMBtu/hr Fuel: natural gas only	N/A

[August 6, 2009]

2. FACILITY-WIDE CONDITIONS

Fugitive Emissions

2.1 All reasonable precautions shall be taken to prevent PM from becoming airborne in accordance with IDAPA 58.01.01.650-651. In determining what is reasonable, consideration will be given to factors such as the proximity of dust-emitting operations to human habitations and/or activities and atmospheric conditions that might affect the movement of particulate matter. Some of the reasonable precautions include, but are not limited to, the following:

- Use, where practical, of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads, or the clearing of lands.
- Application, where practical, of asphalt, oil, water, or suitable chemicals to, or covering of, dirt roads, material stockpiles, and other surfaces which can create dust.
- Installation and use, where practical, of hoods, fans, and fabric filters or equivalent systems to enclose and vent the handling of dusty materials. Adequate containment methods should be employed during sandblasting or other operations.
- Covering, where practical, of open-bodied trucks transporting materials likely to give rise to airborne dusts.
- Paving of roadways and their maintenance in a clean condition, where practical.
- Prompt removal of earth or other stored material from streets, where practical.

2.2 To establish reasonable precautions, the permittee shall establish and maintain a Fugitive Dust Control Plan which identifies potential sources of fugitive dust and which establishes good operating practices for limiting the formation and dispersion of dust from those sources.

The Fugitive Dust Control Plan (Plan) shall contain, at a minimum, the following information and requirements:

1. List all of the potential sources of fugitive dust from the facility.
2. Require application of water from trucks or spray systems for the control of dust in disturbed areas, haul roads and load-out areas. The Plan must establish criteria to determine when water must be applied. Water does not need to be applied when the surface is wet (i.e. during/following rainy conditions) or when reduced ambient temperatures may cause the water to freeze. The applicant may choose to use surface improvements to existing roads in lieu of water application where appropriate to control fugitive dust.
3. Require application of suitable dust suppressant chemicals (e.g., magnesium chloride) to unpaved roads during the dry season or when otherwise necessary to control fugitive dust. The Plan must establish criteria to determine when dust suppressant must be applied. The applicant may choose to use surface improvements to existing roads in lieu of dust suppressant application where appropriate to control fugitive dust.
4. Develop a dust control strategy for the concrete batch plant operations. The Plan must establish criteria to determine when dust control is needed for the concrete batch plant operations. Suitable dust control strategies for the concrete batch plant operations include water spray systems, dust suppressant chemicals, enclosures, mechanical control devices, or a DEQ approved alternative method.
5. Establish procedures to minimize material drop heights and dust formation during transfer operations.

6. Establish procedures to minimize dust formation during conveying operations.
7. Training/orientation of employees about the Fugitive Dust Control Plan procedures.
8. The Fugitive Dust Control Plan shall be maintained in accordance with General Provision 7.
9. When in operation, the permittee shall comply with the provisions in the approved Fugitive Dust Control Plan at all times. Whenever an operating parameter is outside the operating range specified by the plan or the criteria established by the plan are trigged, the permittee shall take corrective action as expeditiously as practicable to bring the operating parameter back within the operating range.
10. Establish weekly monitoring and recording of those criteria established by the plan which triggers an action to be taken to control fugitive dust.
11. A copy of the Fugitive Dust Control Plan shall remain onsite at all times and shall be submitted to the Coeur d'Alene DEQ Regional Office at the following address within 45 days of permit issuance:

2110 Ironwood Pkwy
Coeur d'Alene, ID 83814
Phone: (208) 769-1422

[August 6, 2009]

2.3 The permittee shall monitor and maintain records of the frequency and the method(s) used (i.e., water, chemical dust suppressants, etc.) to reasonably control fugitive emissions once each calendar day the facility operates. The most recent five years of data shall be kept on-site and be made available to Department representatives upon request.

[August 6, 2009]

2.4 The permittee shall maintain records of all fugitive dust complaints received. The permittee shall take appropriate corrective action as expeditiously as practicable after receipt of a valid complaint. The records shall include, at a minimum, the date that each complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.

[August 6, 2009]

2.5 The permittee shall conduct a facility-wide inspection of potential sources of fugitive emissions, during daylight hours and under normal operating conditions once each calendar day the facility operates, to ensure that the methods used to reasonably control fugitive emissions are effective. If fugitive emissions are not being reasonably controlled, the permittee shall take corrective action as expeditiously as practicable. The permittee shall maintain records of the results of each fugitive emissions inspection. The records shall include, at a minimum, the date of each inspection and a description of the following: the permittee's assessment of the conditions existing at the time fugitive emissions were present (If observed), any corrective action taken in response to the fugitive emissions, and the date the corrective action was taken.

[August 6, 2009]

Odors

2.6 The permittee shall not allow, suffer, cause, or permit the emission of odorous gases, liquids, or solids to the atmosphere in such quantities as to cause air pollution.

[August 6, 2009]

2.7 The permittee shall maintain records of all odor complaints received. If the complaint has merit, the permittee shall take appropriate corrective action as expeditiously as practicable. The records shall include, at a minimum, the date that each complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.

[August 6, 2009]

Visible Emissions

2.8 The permittee shall not discharge any air pollutant to the atmosphere from any point of emission for a period or periods aggregating more than three minutes in any 60-minute period which is greater than 20% opacity as determined by procedures contained in IDAPA 58.01.01.625. These provisions shall not apply when the presence of uncombined water, NO_x, and/or chlorine gas is the only reason for the failure of the emission to comply with the requirements of this section.

2.9 The permittee shall conduct a quarterly facility-wide inspection of potential sources of visible emissions, during daylight hours and under normal operating conditions. Sources that are monitored using a continuous opacity monitoring system (COMS) are not required to comply with this permit condition. The inspection shall consist of a see/no see evaluation for each potential source of visible emissions. If any visible emissions are present from any point of emission, the permittee shall either

a) take appropriate corrective action as expeditiously as practicable to eliminate the visible emissions. Within 24 hours of the initial see/no see evaluation and after the corrective action, the permittee shall conduct a see/no see evaluation of the emissions point in question. If the visible emissions are not eliminated, the permittee shall comply with b).

or

b) perform a Method 9 opacity test in accordance with the procedures outlined in IDAPA 58.01.01.625. A minimum of 30 observations shall be recorded when conducting the opacity test. If opacity is greater than 20%, as measured using Method 9, for a period or periods aggregating more than three minutes in any 60-minute period, the permittee shall take all necessary corrective action and report the exceedance in its annual compliance certification and in accordance with IDAPA 58.01.01.130-136.

The permittee shall maintain records of the results of each visible emission inspection and each opacity test when conducted. The records shall include, at a minimum, the date and results of each inspection and test and a description of the following: the permittee's assessment of the conditions existing at the time visible emissions are present (if observed), any corrective action taken in response to the visible emissions, and the date corrective action was taken.

Open Burning

2.10 The permittee shall comply with the requirements of the Rules for Control of Open Burning, IDAPA 58.01.01.600-623.

[August 6, 2009]

Reports and Certifications

2.11 Any reporting required by this permit, including, but not limited to, records, monitoring data, supporting information, requests for confidential treatment, notifications of intent to test, testing reports, or compliance certifications, shall contain a certification by a responsible official. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document(s) are true, accurate, and complete. Any reporting required by this permit, **with the exception of a Portable Equipment Registration and Relocation form,** shall be submitted to the following address:

Air Quality Permit Compliance
Department of Environmental Quality
Coeur d'Alene Regional Office
2110 Ironwood Parkway
Coeur d'Alene, ID 83814
Phone: (208) 769-1422
Fax: (208) 769-1404

[August 6, 2009]

Obligation to Comply

2.12 Receiving a Tier II operating permit shall not relieve any owner or operator of the responsibility to comply with all applicable local, state, and federal rules and regulations.

3. JOHNSON 630 PORTABLE CONCRETE BATCH PLANT

3.1 Process Description

This operation is a truck mix concrete batch plant. The components of the truck mix plant are as follows: a cement storage silo, weigh hopper, and aggregate bucket elevator. The truck mix plant combines sand, gravel, cement, and fly ash. Mixer trucks blend the mixture and transport the concrete off-site.

3.2 Emission Control Description

Emissions of particulate matter (PM) and particulate matter with an aerodynamic diameter less than or equal to ten microns (PM_{10}) from the cement storage silo and fly ash storage silo are controlled by baghouses. Table 3.1 describes the control devices or measures associated with the concrete batch plant.

Table 3.1 CONCRETE BATCH PLANT DESCRIPTION

Emissions Unit / Process	Emissions Control Device	Emissions Point
Cement storage silo	Baghouse	Exit height: 9.4 m (31 ft) Exit flow rate: 260 cfm
Fly ash storage silo	Baghouse	Exit height: 10.4 m (31 ft) Exit flow rate: 260 cfm
All associated fugitive PM/PM_{10} emissions from the following: sand, aggregate, and cement transfer from batch mix plant into drum of concrete delivery truck, or equivalent	Shrouding fogger unit	N/A
All associated fugitive PM/PM_{10} emissions from the following: sand and aggregate transfers, weigh hopper loading, vehicle traffic, and wind erosion of stockpiles	Reasonable control	N/A

[August 6, 2009]

Emissions Limits

3.3 Baghouse Stack Emission Limits

PM_{10} emissions from the cement storage silo baghouse exhaust stack shall not exceed 0.034 pounds per hour (lb/hr) or 0.03 tons per year (T/yr).

Operating Requirements

3.4 MaximumThroughput Limits

3.4.1 Winter Operations

The maximum daily concrete throughput during the months of November through March shall not exceed two hundred seventy cubic yards per day (270 cy/day).

3.4.2 Summer Operations

The maximum daily concrete throughput during the months of April through October shall not exceed four hundred cubic yards per day (400 cy/day).

3.5 Fly Ash Substitution Rate Limit

The permittee shall not use more than 30% fly ash in place of cement on a cubic yard basis.

[August 6, 2009]

3.6 Shrouding Fogger Unit

The shrouding fogger unit shall be used at all times when transferring cement and aggregate materials into the drum of a cement truck.

3.7 Baghouse Procedures

Within 60 days of issuance of this permit, the permittee shall have developed a Baghouse Procedures document for the inspection and operation of the baghouse which controls emissions from the cement storage silo and the fly ash storage silo. The Baghouse Procedures document shall be a permittee developed document independent of the manufacturer supplied operating manual but may include summaries of procedures included in the manufacturer supplied operating manual.

The Baghouse Procedures document shall describe the procedures that will be followed to comply with General Provision 2 and shall contain requirements for weekly see-no-see visible emissions inspections of the baghouse. The inspection shall occur during daylight hours and under normal operating conditions.

The Baghouse Procedures document shall also include a schedule and procedures for corrective action that will be taken if visible emissions are present from the baghouse at anytime. At a minimum the document shall include:

- procedures to determine if bags or cartridges are ruptured; and
- procedures to determine if bags or cartridges are not appropriately secured in place.

The permittee shall maintain records of the results of each baghouse inspection in accordance with General Provision 7. The records shall include a description of whether visible emissions were present and if visible emissions were present a description of the corrective action that was taken.

The Baghouse Procedures document shall also remain on site at all times and shall be made available to DEQ representatives upon request. The operating and monitoring requirements specified in the Baghouse Procedures document are incorporated by reference to this permit and are enforceable permit conditions.

[August 6, 2009]

3.8 Mandatory Curtailment/Air Stagnation Advisory Date

There shall be no operation of the concrete batch plant during days of Mandatory Curtailment and/or Air Stagnation Advisory.

Monitoring and Recordkeeping Requirements

3.9 Concrete Throughput Monitoring

3.9.1 Winter Operations

The permittee shall monitor and record the concrete throughput rate once per day to demonstrate compliance with Section 3.4.1 of this permit. The amount shall be recorded in cubic yards per day (cy/day) in a log kept at the facility for the most recent five-year period. The log shall be made available to Department representatives upon request.

3.9.2 Summer Operations

The permittee shall monitor and record the concrete throughput rate once per day to demonstrate compliance with Section 3.4.2 of this permit. The amount shall be recorded in cubic yards per day (cy/day) in a log kept at the facility for the most recent five-year period. The log shall be made available to Department representatives upon request.

3.10 Relocation

At least ten (10) days prior to relocation of the concrete batch plant covered by this permit, the permittee shall report to DEQ, on forms supplied by DEQ, the following information:

3.10.1 Location of the new site operations;

3.10.2 Start-up date at the new site of operations and the duration of the operations at the new site; and

3.10.3 A plot plan clearly showing the property boundary of the new site.

4. NATURAL GAS-FIRED BOILER

4.1 Process Description

Lake Pre-Mix utilizes a "heat as used" type water boiler (i.e. there is no holding tank for heated water). The boiler is used only for hot water needed to mix with concrete. The boiler uses natural gas as fuel.

4.2 Emission Control Description

There are no emission control units for the natural gas-fired boiler.

Table 4.1 NATURAL GAS-FIRED BOILER DESCRIPTION

Emissions Unit / Process	Emissions Control Device
NATCO A53G Water Boiler	N/A

Emissions Limits

4.3 Boiler Emission Limits

The PM_{10}, SO_2, NO_X, VOC, and CO emissions from the water boiler shall not exceed any corresponding emissions rate limits listed in Table 4.2.

Table 4.2 WATER BOILER EMISSIONS LIMITS

Source Description	PM_{10}		SO_2		NO_X		VOC		CO	
	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr
Water Boiler (Natural Gas Fuel)	0.018	0.079	0.02	0.09	N/A	1.04	N/A	0.06	0.20	0.88

[August 6, 2009]

4.4 Grain Loading Limit

The permittee shall not discharge to the atmosphere from the NATCO A53G Boiler stack PM in excess of 0.015 gr/dscf of effluent gas corrected to 3% oxygen by volume for gas, as required by IDAPA 58.01.01.676.

[August 6, 2009]

4.5 Opacity Limit

Visible emissions from the NATCO A53G boiler stack, or any other stack, vent, or functionally equivalent opening associated with the boiler shall not exceed 20% opacity for a period or periods aggregating more than three minutes in any 60-minute period as required by IDAPA 58.01.01.625. Opacity shall be determined by the procedures contained in IDAPA 58.01.01.625.

[August 6, 2009]

Operating Requirements

4.6 Allowable Fuels

To demonstrate compliance with the Emissions Limits Permit Condition, the NATCO A53G Boiler shall only combust natural gas as fuel.

[August 6, 2009]

Monitoring and Recordkeeping Requirements

4.7 Monitoring and Recordkeeping

The permittee shall comply with the recordkeeping requirements of General Provision 7.

[August 6, 2009]

5. SUMMARY OF EMISSION RATE LIMITS

Table 5.1 provides a summary of all emission rate limits required by this permit.

Table 5.1 SUMMARY OF EMISSION RATE LIMITS

Emission Limits[a] – Hourly (lb/hr), and Annual[b] (T/yr)										
Source Description	PM_{10}[c]		NO_x		CO		VOC		SO_2	
	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr
Johnson 630 Concrete Batch Plant	0.034	0.03	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
NATCO A53G Water Boiler	0.018	0.079	N/A	1.04	0.20	0.88	N/A	0.06	0.02	0.09

[a] As determined by a pollutant-specific EPA reference method, a DEQ-approved alternative, or as determined by DEQ's emissions estimation methods used in this permit analysis.

[b] As determined by multiplying the actual or allowable (if actual is not available) pound per hour emission rate by the allowable hours per year that the process(es) may operate(s), or by actual annual production rates.

[c] Includes condensibles

[August 6, 2009]

6. TIER II PERMIT TO OPERATE GENERAL PROVISIONS

General Compliance

1. The permittee has a continuing duty to comply with all terms and conditions of this permit. All emissions authorized herein shall be consistent with the terms and conditions of this permit and the Rules for the Control of Air Pollution in Idaho. The emissions of any pollutant in excess of the limitations specified herein, or noncompliance with any other condition or limitation contained in this permit, shall constitute a violation of this permit and the Rules for the Control of Air Pollution in Idaho, and the Environmental Protection and Health Act, Idaho Code §39-101, et seq.

[Idaho Code §39-101, et seq.]

2. The permittee shall at all times (except as provided in the Rules for the Control of Air Pollution in Idaho) maintain in good working order and operate as efficiently as practicable, all treatment or control facilities or systems installed or used to achieve compliance with the terms and conditions of this permit and other applicable Idaho laws for the control of air pollution.

[IDAPA 58.01.01.211, 5/1/94]

3. Nothing in this permit is intended to relieve or exempt the permittee from the responsibility to comply with all applicable local, state, or federal statutes, rules and regulations.

[IDAPA 58.01.01.212.01, 5/1/94]

Inspection and Entry

4. Upon presentation of credentials, the permittee shall allow DEQ or an authorized representative of DEQ to do the following:
   a. Enter upon the permittee's premises where an emissions source is located or emissions related activity is conducted, or where records are kept under conditions of this permit;
   b. Have access to and copy, at reasonable times, any records that are kept under the conditions of this permit;
   c. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
   d. As authorized by the Idaho Environmental Protection and Health Act, sample or monitor, at reasonable times, substances or parameters for the purpose of determining or ensuring compliance with this permit or applicable requirements.

[Idaho Code §39-108]

Construction and Operation Notification

5. The permittee shall furnish DEQ written notifications as follows in accordance with IDAPA 58.01.01.211:
   a. A notification of the date of initiation of construction, within five working days after occurrence;
   b. A notification of the date of any suspension of construction, if such suspension lasts for one year or more;
   c. A notification of the anticipated date of initial start-up of the stationary source or facility not more than sixty days or less than thirty days prior to such date;
   d. A notification of the actual date of initial start-up of the stationary source or facility within fifteen days after such date; and

e. A notification of the initial date of achieving the maximum production rate, within five working days after occurrence - production rate and date.

[IDAPA 58.01.01.211, 5/1/94]

Performance Testing

6. If performance testing (air emissions source test) is required by this permit, the permittee shall provide notice of intent to test to DEQ at least 15 days prior to the scheduled test date or shorter time period as approved by DEQ. DEQ may, at its option, have an observer present at any emissions tests conducted on a source. DEQ requests that such testing not be performed on weekends or state holidays.

   All performance testing shall be conducted in accordance with the procedures in IDAPA 58.01.01.157. Without prior DEQ approval, any alternative testing is conducted solely at the permittee's risk. If the permittee fails to obtain prior written approval by DEQ for any testing deviations, DEQ may determine that the testing does not satisfy the testing requirements. Therefore, at least 30 days prior to conducting any performance test, the permittee is encouraged to submit a performance test protocol to DEQ for approval. The written protocol shall include a description of the test method(s) to be used, an explanation of any or unusual circumstances regarding the proposed test, and the proposed test schedule for conducting and reporting the test.

   Within 30 days following the date in which a performance test required by this permit is concluded, the permittee shall submit to DEQ a performance test report. The written report shall include a description of the process, identification of the test method(s) used, equipment used, all process operating data collected during the test period, and test results, as well as raw test data and associated documentation, including any approved test protocol.

   [IDAPA 58.01.01.157, 4/5/00]

Monitoring and Recordkeeping

7. The permittee shall maintain sufficient records to ensure compliance with all of the terms and conditions of this permit. Records of monitoring information shall include, but not be limited to the following: (a) the date, place, and times of sampling or measurements; (b) the date analyses were performed; (c) the company or entity that performed the analyses; (d) the analytical techniques or methods used; (e) the results of such analyses; and (f) the operating conditions existing at the time of sampling or measurement. All monitoring records and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report, or application. Supporting information includes, but is not limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation and copies of all reports required by this permit. All records required to be maintained by this permit shall be made available in either hard copy or electronic format to DEQ representatives upon request.

   [IDAPA 58.01.01.211, 5/1/94]

Excess Emissions

8. The permittee shall comply with the procedures and requirements of IDAPA 58.01.01.130-136 for excess emissions due to startup, shutdown, scheduled maintenance, safety measures, upsets and breakdowns.

   [IDAPA 58.01.01.130-136, 4/5/00]

Certification

9. All documents submitted to DEQ, including, but not limited to, records, monitoring data, supporting information, requests for confidential treatment, testing reports, or compliance certification shall contain a certification by a responsible official. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document(s) are true, accurate, and complete.

[IDAPA 58.01.01.123, 5/1/94]

False Statements

10. No person shall knowingly make any false statement, representation, or certification in any form, notice, or report required under this permit, or any applicable rule or order in force pursuant thereto.

[IDAPA 58.01.01.125, 3/23/98]

Tampering

11. No person shall knowingly render inaccurate any monitoring device or method required under this permit or any applicable rule or order in force pursuant thereto.

[IDAPA 58.01.01.126, 3/23/98]

Transferability

12. This permit is transferable in accordance with procedures listed in IDAPA 58.01.01.209.06.

[IDAPA 58.01.01.209.06, 4/11/06]

Severability

13. The provisions of this permit are severable, and if any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.

[IDAPA 58.01.01.322.15.h, 5/1/94; 40 CFR 70.6(a)(5)]

Attachment B

Air Quality

PERMIT TO CONSTRUCT

Permittee	Lake Pre-mix, Inc
Permit Number	P-2018.0012
Project ID	62000
Facility ID	017-00072
Facility Location	360 McNearney Rd Ponderay, ID 83852

Permit Authority

This permit (a) is issued according to the "Rules for the Control of Air Pollution in Idaho" (Rules), IDAPA 58.01.01.200–228; (b) pertains only to emissions of air contaminants regulated by the State of Idaho and to the sources specifically allowed to be constructed or modified by this permit; (c) has been granted on the basis of design information presented with the application; (d) does not affect the title of the premises upon which the equipment is to be located; (e) does not release the permittee from any liability for any loss due to damage to person or property caused by, resulting from, or arising out of the design, installation, maintenance, or operation of the proposed equipment; (f) does not release the permittee from compliance with other applicable federal, state, tribal, or local laws, regulations, or ordinances; and (g) in no manner implies or suggests that the Idaho Department of Environmental Quality (DEQ) or its officers, agents, or employees assume any liability, directly or indirectly, for any loss due to damage to person or property caused by, resulting from, or arising out of design, installation, maintenance, or operation of the proposed equipment. Changes in design, equipment, or operations may be considered a modification subject to DEQ review in accordance with IDAPA 58.01.01.200–228.

Date Issued Choose DRAFT or month Choose day, 2018

Tom Burnham, Permit Writer

Mike Simon, Stationary Source Manager

Contents

1 Permit Scope

Purpose

1.1 This is the initial permit to construct (PTC) for a stationary concrete batch plant facility.

Regulated Sources

Table 1.1 lists all sources of regulated emissions in this permit.

Table 1.1 Regulated Sources

Permit Section	Source	Control Equipment
2	Material Transfer Points: Materials handling Concrete aggregate transfers Truck unloading of aggregate Aggregate conveyor transfers Aggregate handling	Maintaining the moisture content in ¼" or smaller aggregate material at 1.5% by weight, using water sprays, using shrouds, or other emissions controls
3	Concrete Batch Plant – Truck Mix: Manufacturer: Con-E-Co Model: LoPro 327 Manufacture Date: 2011 Max. production: 65 yd^3/hr, 650yd^3/day, and 35,000 yd^3/yr Cement Storage Silo: Bin Vent Filter Manufacturer[a]: WAM Model: Silotop R03 Fly Ash Storage Silo: Bin Vent Filter Manufacturer[a]: Con-E-Co Model: PJC-450	Weigh Batcher Baghouse: Manufacturer: Wam Model: BV14-23 $PM_{10}/PM_{2.5}$ control efficiency: 99.9% Cement Storage Silo Bin Vent Filter/Baghouse: Manufacturer: Wam Model: Silotop R03 $PM_{10}/PM_{2.5}$ control efficiency: 99.9% Fly Ash Storage Silo Bin Vent Filter/Baghouse: Manufacturer: Con-E-Co Model: PJC-450 $PM_{10}/PM_{2.5}$ control efficiency: 99.9% Truck Load-out: Manufacturer: Con-E-Co Model: PJC-900 Control: Baghouse $PM_{10}/PM_{2.5}$ control efficiency: 99% Material Transfer Points: Control: Water sprays $PM_{10}/PM_{2.5}$ control efficiency: 75%

[a] The storage silo baghouses are process equipment as they are part of the physical and operational design of the silos; therefore, the potential to emit does not have to be federally enforceable when calculating PTE from the silo's. PM_{10} controlled emission factors were used when determining PTE and for modeling purposes.

2 Facility-Wide Conditions

Fugitive Dust Control

2.1 Reasonable Control of Fugitive Emissions

In accordance with IDAPA 58.01.01.650-651, all reasonable precautions shall be taken to prevent particulate matter from becoming airborne.

The permittee shall monitor and maintain records of the frequency and the method(s) used (e.g., water, chemical dust suppressants) to reasonably control fugitive dust emissions.

The permittee shall maintain records of all fugitive dust complaints received. The permittee shall take appropriate corrective action as expeditiously as practicable after receipt of a valid complaint. The records shall include, at a minimum, the date that each complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.

The permittee shall conduct a daily facility-wide inspection of potential sources of fugitive dust emissions, during daylight hours and under normal operating conditions to ensure that the methods used to reasonably control fugitive dust emissions are effective. If fugitive dust emissions are not being reasonably controlled, the permittee shall take corrective action as expeditiously as practicable. The permittee shall maintain records of the results of each fugitive dust emissions inspection. The records shall include, at a minimum, the date of each inspection and a description of the following: the permittee's assessment of the conditions existing at the time fugitive emissions were present (if observed), any corrective action taken in response to the fugitive dust emissions, and the date the corrective action was taken.

2.2 Fugitive Emissions Controls

In accordance with IDAPA 58.01.01.650 and 651, the concrete batch plant shall employ efficient fugitive dust controls. The Permittee shall implement and maintain, but are not limited to, the following controls:

- Application, where practical, of water, or suitable chemicals to, or the covering of, dirt roads, material stockpiles, and other surfaces which can create dust. This fugitive dust control is employed at this facility and the Permittee shall be able to demonstrate this to DEQ staff.
- Installation and use, where practical, of hoods, fans, and fabric filters systems to enclose the handling of dusty materials. This fugitive dust control is employed at this facility and the Permittee shall be able to demonstrate this to DEQ staff.

Good operating practices, including water spraying or other suitable measures, shall be employed to prevent dust generation and atmospheric entrainment during operations such as stockpiling, screen changing and general maintenance. The Permittee shall be able to demonstrate this to DEQ staff.

Odors

2.3 Odors

The permittee shall not allow, suffer, cause, or permit the emission of odorous gases, liquids, or solids into the atmosphere in such quantities as to cause air pollution in accordance with IDAPA 58.01.01.776.01.

Monitoring and Recordkeeping Requirements

2.4 Fugitive Dust Monitoring and Recordkeeping

The permittee shall conduct a facility-wide inspection of potential sources of visible fugitive emissions during daylight hours and under normal operating conditions once each day that the concrete batch plant operates, to demonstrate compliance with the Reasonable Control of Fugitive Emissions and the Fugitive Emissions Controls permit conditions. The inspection shall consist of a see/no see evaluation for each potential source of visible fugitive emissions. If any visible fugitive emissions are present from any source of fugitive emissions, the permittee shall take appropriate corrective action as expeditiously as practicable to mitigate the visible fugitive emissions.

The permittee shall maintain records of the results of each see/no see evaluation of visible fugitive emissions inspection. The records shall include, at a minimum, the date and results of each inspection and a description of the following: the permittee's assessment of the conditions existing at the time visible fugitive emissions are present (if observed), any corrective action taken in response to the visible fugitive emissions, and the date corrective action was taken.

2.5 Odor Complaints

The permittee shall maintain records of all odor complaints received to demonstrate compliance with the Odors permit condition. The permittee shall take appropriate corrective action as expeditiously as practicable. The records shall include, at a minimum, the date each complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.

2.6 Recordkeeping

All monitoring and recordkeeping documentation required by this permit shall be maintained in accordance with the Recordkeeping general provision.

3 Concrete Batch Plant Equipment

3.1 Process Description

The facility is a stationary truck mix concrete batch plant consisting of aggregate stockpiles, a cement storage silo, a cement supplement (fly ash) storage silo, a weigh batcher, and conveyors. The facility combines aggregate, sand, fly ash, and cement and then transfers the mixture into a truck along with a measured amount of water for in-transit of the concrete. Power will be supplied to the facility by using line power.

3.2 Control Device Descriptions

Table 3.1 Concrete Batch Plant Description

Emissions Units / Processes	Control Devices	Emission Points
Cement storage silo	Baghouse	Cement storage silo baghouse exhaust
Cement supplement storage silo fly ash	Bahouse[a]	Fly ash storage silo baghouse exhaust
Weigh batcher	Baghouse	Weigh batcher baghouse exhaust
Truck loadout	Boot with Baghouse	Truck loadout baghouse exhaust
Material transfer points (fugitive)	Industry specific water sprays	fugitive
Natural Gas boiler	N/A	Boiler exhaust

a) As discussed previously, the baghouses are considered process equipment.

Emission Limits

3.3 Emission Limits

The emissions from the concrete batch plant and boiler stacks shall not exceed any emissions rate limit in the following table.

Table 3.2 Concrete Batch Plant Emission Limits

Source Description	$PM_{10}/PM_{2.5}$ [b]		SO_2		NO_X		CO		VOC	
	lb/hr [c]	T/yr [d]	lb/hr [c]	T/yr [d]	lb/hr [c]	T/yr [d]	lb/hr [c]	T/yr [d]	lb/hr [c]	T/yr [d]
Concrete batch plant	0.03	0.01	NA	NA	NA	NA	NA	NA	NA	NA
Boiler	0.015	0.064	0.001	0.005	0.191	0.837	0.161	0.703	0.011	0.046

a In absence of any other credible evidence, compliance is ensured by complying with permit operating, monitoring, and record keeping requirements.

b Particulate matter with an aerodynamic diameter less than or equal to a nominal ten (10) micrometers and two point five (2.5) micrometers, including condensable particulate as defined in IDAPA 58.01.01.006.

c Pounds per hour, as determined by a test method prescribed by IDAPA 58.01.01.157, EPA reference test method, continuous emission monitoring system (CEMS) data, or DEQ-approved alternative.

d Tons per any consecutive 12-calendar month period.

3.4 Opacity Limit

Emissions from the concrete batch plant baghouse and boiler stacks, or any other stack, vent, or functionally equivalent opening associated with the concrete batch plant baghouse and boiler, shall not exceed 20% opacity for a period or periods aggregating more than three minutes in any 60-minute period as required by IDAPA 58.01.01.625. Opacity shall be determined by the procedures contained in IDAPA 58.01.01.625.

Operating Requirements

3.5 Concrete Production Limits

Concrete production from this facility shall not exceed the following limits:

- 650 cubic yards per day
- 35,000 cubic yards per consecutive 12-months

3.6 Boot or Shroud Control Equipment

The permittee shall install, operate, and maintain a boot or shroud to control emissions from the truck loadout operation.

3.7 Baghouse System Control Equipment

The permittee shall install, operate, and maintain a baghouse to control emissions from the truck loadout operation.

3.8 Industry Specific Water Sprays Control Equipment

The permittee shall install, operate, and maintain industry specific water sprays on material transfer points to control fugitive emissions.

Monitoring and Recordkeeping Requirements

3.9 Concrete Production Recordkeeping

For each day that the concrete batch plant is operated the Permittee shall maintain the following records:

- The amount of concrete produced in yards per day to demonstrate compliance with the Concrete Production Limits permit condition.

Monthly concrete production shall be determined by summing daily production over the previous calendar month. Consecutive 12-months of concrete production shall be determined by summing the monthly production over the previous consecutive 12 month period to demonstrate compliance with the consecutive 12-months Concrete Production Limits permit condition.

3.10 Baghouse/Filter System Procedures

Within 60 days of permit issuance, the permittee shall have developed a Baghouse Filter System Procedures document for the inspection and operation of the baghouse filter system which controls particulate matter emissions from the weigh batcher and truck loadout operation. The Baghouse Filter System Procedures document shall be a permittee-developed document independent of the manufacturer supplied operating manual but may include summaries of procedures included in the manufacturer supplied operating manual.

The Baghouse Filter System Procedures document shall describe the procedures that will be followed to comply with the General Compliance General Provisions and shall contain requirements for monthly see/no-see visible emissions inspections of the baghouse. The inspection shall occur during daylight hours and under normal operating conditions.

The Baghouse/Filter System Procedures document shall include a schedule and procedures for corrective action that will be taken if visible emissions are present from the weigh batcher and truck loadout operation baghouse at any time. At a minimum the document shall include:

- Procedures to determine if bags or cartridges are ruptured; and
- Procedures to determine if bags or cartridges are not appropriately secured in place.

The permittee shall maintain records of the results of each baghouse filter system inspection. The records shall include, but not be limited to, the following:

- Date and time of inspection,
- Equipment inspected (e.g. exterior housing of baghouse, fan motor, auger, inlet air ducting);
- Description of whether visible emissions were present, and if visible emissions were present a description of the corrective action that was taken.
- Date corrective action was taken.

The Baghouse Filter System Procedures document shall be submitted to DEQ within 60 days after permit issuance and shall contain a certification by a responsible official. Any changes to the Baghouse Filter System Procedures document shall be submitted within 15 days of the change.

The Baghouse Filter System Procedures document shall remain on-site at all times and shall be made available to DEQ representatives upon request.

The operating, monitoring, and recordkeeping requirements specified in the Baghouse Filter System Procedures document are incorporated by reference into this permit and are enforceable permit conditions.

3.11 Recordkeeping

All monitoring and recordkeeping documentation required by this permit shall be maintained in accordance with the Recordkeeping general provision.

4 General Provisions

General Compliance

4.1 The permittee has a continuing duty to comply with all terms and conditions of this permit. All emissions authorized herein shall be consistent with the terms and conditions of this permit and the "Rules for the Control of Air Pollution in Idaho." The emissions of any pollutant in excess of the limitations specified herein, or noncompliance with any other condition or limitation contained in this permit, shall constitute a violation of this permit, the "Rules for the Control of Air Pollution in Idaho," and the Environmental Protection and Health Act (Idaho Code §39-101, et seq.)

[Idaho Code §39-101, et seq.]

4.2 The permittee shall at all times (except as provided in the "Rules for the Control of Air Pollution in Idaho") maintain in good working order and operate as efficiently as practicable all treatment or control facilities or systems installed or used to achieve compliance with the terms and conditions of this permit and other applicable Idaho laws for the control of air pollution.

[IDAPA 58.01.01.211, 5/1/94]

4.3 Nothing in this permit is intended to relieve or exempt the permittee from the responsibility to comply with all applicable local, state, or federal statutes, rules, and regulations.

[IDAPA 58.01.01.212.01, 5/1/94]

Inspection and Entry

4.4 Upon presentation of credentials, the permittee shall allow DEQ or an authorized representative of DEQ to do the following:

- Enter upon the permittee's premises where an emissions source is located, emissions-related activity is conducted, or where records are kept under conditions of this permit;
- Have access to and copy, at reasonable times, any records that are kept under the conditions of this permit;
- Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
- As authorized by the Idaho Environmental Protection and Health Act, sample or monitor, at reasonable times, substances or parameters for the purpose of determining or ensuring compliance with this permit or applicable requirements.

[Idaho Code §39-108]

Construction and Operation Notification

4.5 This permit shall expire if construction has not begun within two years of its issue date, or if construction is suspended for one year.

[IDAPA 58.01.01.211.02, 5/1/94]

4.6 The permittee shall furnish DEQ written notifications as follows:

- A notification of the date of initiation of construction, within five working days after occurrence; except in the case where pre-permit construction approval has been granted then notification shall be made within five working days after occurrence or within five working days after permit issuance whichever is later;

- A notification of the date of any suspension of construction, if such suspension lasts for one year or more; and
- A notification of the initial date of achieving the maximum production rate, within five working days after occurrence - production rate and date.

[IDAPA 58.01.01.211.01, 5/1/94]

- A notification of the anticipated date of initial start-up of the stationary source or facility not more than sixty days or less than thirty days prior to such date; and
- A notification of the actual date of initial start-up of the stationary source or facility within fifteen days after such date.

[IDAPA 58.01.01.211.03, 5/1/94]

Performance Testing

4.7 If performance testing (air emissions source test) is required by this permit, the permittee shall provide notice of intent to test to DEQ at least 15 days prior to the scheduled test date or shorter time period as approved by DEQ. DEQ may, at its option, have an observer present at any emissions tests conducted on a source. DEQ requests that such testing not be performed on weekends or state holidays.

4.8 All performance testing shall be conducted in accordance with the procedures in IDAPA 58.01.01.157. Without prior DEQ approval, any alternative testing is conducted solely at the permittee's risk. If the permittee fails to obtain prior written approval by DEQ for any testing deviations, DEQ may determine that the testing does not satisfy the testing requirements. Therefore, at least 30 days prior to conducting any performance test, the permittee is encouraged to submit a performance test protocol to DEQ for approval. The written protocol shall include a description of the test method(s) to be used, an explanation of any or unusual circumstances regarding the proposed test, and the proposed test schedule for conducting and reporting the test.

4.9 Within 60 days following the date in which a performance test required by this permit is concluded, the permittee shall submit to DEQ a performance test report. The written report shall include a description of the process, identification of the test method(s) used, equipment used, all process operating data collected during the test period, and test results, as well as raw test data and associated documentation, including any approved test protocol.

[IDAPA 58.01.01.157, 4/5/00 and 4/11/15]

Monitoring and Recordkeeping

4.10 The permittee shall maintain sufficient records to ensure compliance with all of the terms and conditions of this permit. Monitoring records shall include, but not be limited to, the following: (a) the date, place, and times of sampling or measurements; (b) the date analyses were performed; (c) the company or entity that performed the analyses; (d) the analytical techniques or methods used; (e) the results of such analyses; and (f) the operating conditions existing at the time of sampling or measurement. All monitoring records and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report, or application. Supporting information includes, but is not limited to, all calibration and maintenance records, all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. All records required to be maintained by this permit shall be made available in either hard copy or electronic format to DEQ representatives upon request.

[IDAPA 58.01.01.211, 5/1/94]

Excess Emissions

4.11 The permittee shall comply with the procedures and requirements of IDAPA 58.01.01.130–136 for excess emissions due to start-up, shut-down, scheduled maintenance, safety measures, upsets, and breakdowns.

[IDAPA 58.01.01.130–136, 4/5/00]

Certification

4.12 All documents submitted to DEQ—including, but not limited to, records, monitoring data, supporting information, requests for confidential treatment, testing reports, or compliance certification—shall contain a certification by a responsible official. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document(s) are true, accurate, and complete.

[IDAPA 58.01.01.123, 5/1/94]

False Statements

4.13 No person shall knowingly make any false statement, representation, or certification in any form, notice, or report required under this permit or any applicable rule or order in force pursuant thereto.

[IDAPA 58.01.01.125, 3/23/98]

Tampering

4.14 No person shall knowingly render inaccurate any monitoring device or method required under this permit or any applicable rule or order in force pursuant thereto.

[IDAPA 58.01.01.126, 3/23/98]

Transferability

4.15 This permit is transferable in accordance with procedures listed in IDAPA 58.01.01.209.06.

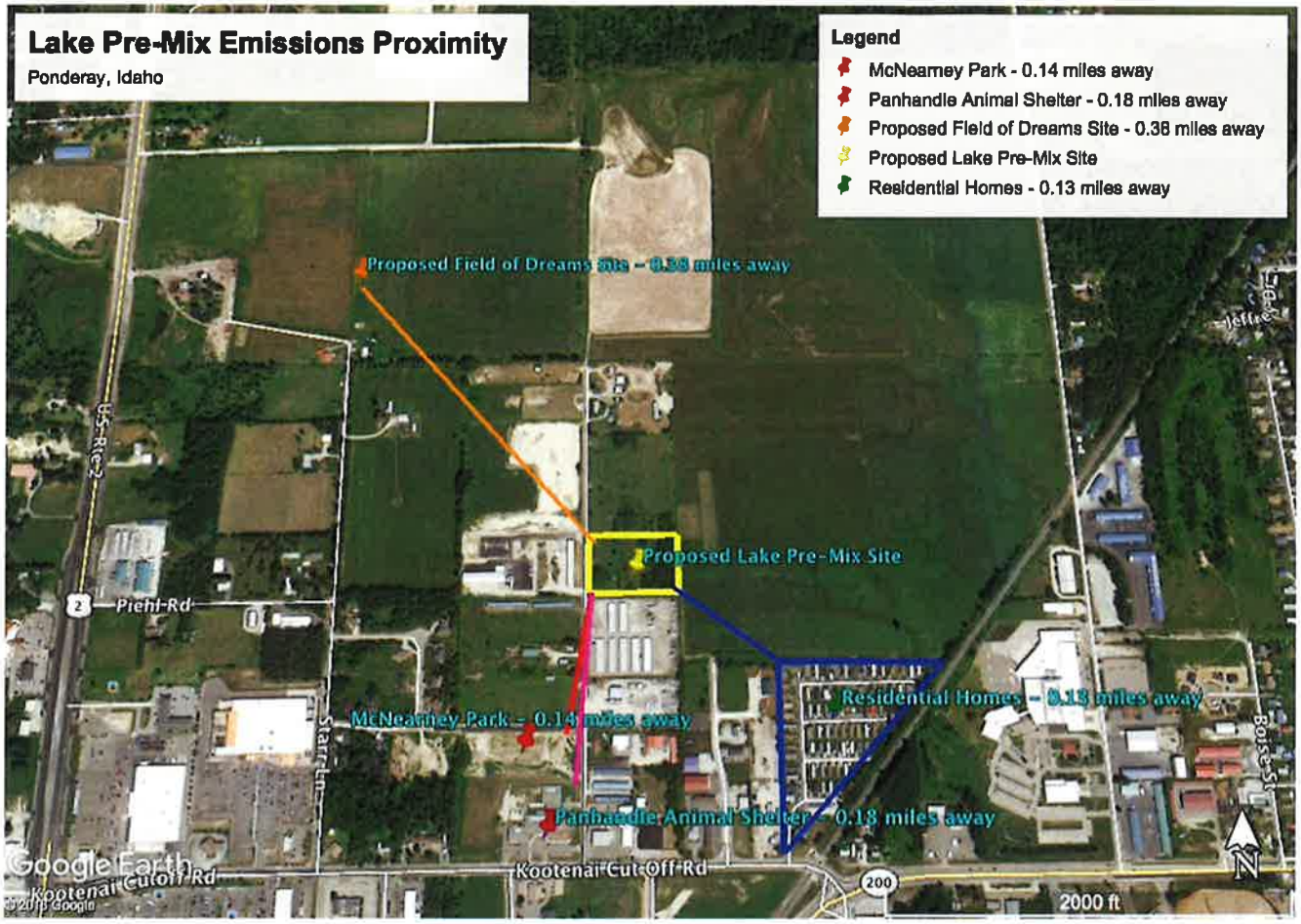
[IDAPA 58.01.01.209.06, 4/11/06]

Severability

4.16 The provisions of this permit are severable, and if any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.

[IDAPA 58.01.01.211, 5/1/94]

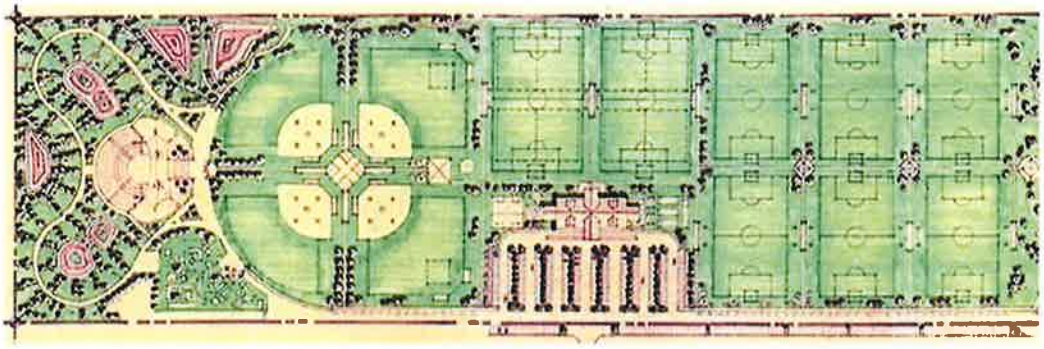
Attachment C



Attachment D

PONDERAY GETS $100K TOWARD FIELD COMPLEX

March 30, 2018 at 5:00 am | By MARY MALONE Staff writer



(Courtesy Photo) A concept rendering from the original Field of Dreams effort, which until now has just been a dream for the city of Ponderay. The LOR Foundation recently awarded the city a $100,000 planning grant, with another $400,000 possible depending on the outcome of the planning.

PONDERAY — The vision for the Field of Dreams is that it would someday be an area for sports and recreation for area youth and adults.

The city of Ponderay acquired the 50-acre property, formerly known as "McGhee Sports Complex" on Highway 95, in 2011. Due to field conditions and cost of development, the property has remained largely untouched over the years — until now.

The LOR Foundation recently awarded the city of Ponderay a $100,000 planning grant for the Field of Dreams, bringing the city's vision a step closer to fruition.

"It is impossible to come up with the words to express our appreciation for what the LOR Foundation has given our community," said Ponderay Mayor Steve Geiger in a statement. "We have been trying to come up with a vision for the Field of Dreams property and now with a generous gift from LOR we will be able to turn the dream into reality. Our area and community as a whole has desperately needed a recreation facility for all ages and for many decades. This project, in addition to future plans for a potential recreation center in Sandpoint will only benefit our communities as a whole."

The planning grant will include community input on the project and a plan for development, and based on the outcome of the plan, LOR is prepared to commit an additional $400,000 for development of the project, according to a statement by LOR officials.

There have been many people over the years who have worked toward making the dream a reality when it comes to the Field of Dreams, said City Planner Erik Brubaker.

There have been several designs created for recreational opportunities on the field over the years, Brubaker said, which include a combination of soccer, baseball and softball fields. One concept design includes an RV park and concert venue as well. There are potential opportunities for a fieldhouse or other recreation facilities with the award from LOR. The city has heard interest in several different types of sports, from rugby and lacrosse, to soccer and baseball. Idaho Parks and Recreation is currently using the land for ATV training, Brubaker said, but for the most part it is a "blank slate."

"From the city's perspective, we are basically making the payments and farming it, and until we got this golden opportunity from the LOR Foundation, the expectation was that it would be a while before we had the resources to develop this regional asset," Brubaker said. "The goal for us now will be to put together a very robust public outreach campaign to create something that honors the spirit of the LOR Foundation grant and contributes to our regional recreation program for the broader community, including, but not limited to, Ponderay residents and businesses."

Public outreach will include engaging surrounding cities, county residents, the school district and all types of recreation-based organizations, he said. The city will be organizing a committee dedicated to moving the planning process forward.

Carol Kunzeman, who served as mayor of Ponderay when the property was purchased, said she became friends with Floyd McGhee during her tenure and they would "chit chat" at the Hoot Owl on occasion.

"I think he was keeping an eye on me as a mayor," Kunzeman said. "He liked the things that were happening and so, one day, he approached me about the possibility of purchasing that land out there."

McGhee's vision, Kunzeman said, was to have something for the community, and her vision was to see a regional recreation park. Where she came from, there was a 19-acre park in the center of town, which made the children's lives "richer and better" as some went on to become professional ball players, Kunzeman said.

"It was just amazing to grow up with this beautiful park in the center of town," she said. "He liked my vision; he saw what it was and we were able to negotiate a deal and purchase the land."

Soccer fields were one of the first ideas, as tournaments are a way to generate money and the economic base in the area would benefit from it, she said. Her vision also included baseball fields, a teen center, an ice hockey rink, a heated swimming pool — a place for the kids.

It also included the other end of the age spectrum, however, as she envisioned a senior center, which Ponderay does not have one of its own. McGhee wanted to build houses behind the 50-acre property in the Kootenai area as well, she said.

Kunzeman said she hoped that, in her lifetime, she would see kids playing on those fields. And though he has passed away, it would have made McGhee happy to see children playing there as well, she said.

"It's a wonderful thing the LOR Foundation has done for the city of Ponderay, that's for sure," Kunzeman said.

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